

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

NEXUS DISPLAY TECHNOLOGIES LLC,	§	
	§	
Movant,	§	
	§	Civil Action No: 3:15-mc-00100-L-BH
v.	§	
	§	
STMICROELECTRONICS, INC.	§	
	§	
Respondent.	§	

**RESPONDENT NEXUS DISPLAY TECHNOLOGIES LLC’S SUBMISSION PURSUANT TO
ORDER DATED SEPTEMBER 11, 2015**

Movant Nexus Display Technologies LLC (“Nexus”) by and through its attorney, hereby files this submission pursuant to Paragraph VI of the Court’s Order dated September 11, 2015, (the “Court Order”).

Though the ECF notice was received by counsel of record, there was a clerical error and the deadlines pursuant to the Court Order were not docketed. Counsel for Nexus and STMicro had had continuing discussions regarding the scope of the discovery required prior to Nexus filing its Motion to Compel. On September 8, 2015, after filing the Motion to Compel and prior to the issuance of the Court Order, Justin Chen emailed Andrew Mayo, in house counsel for STMicro, in a further attempt to resolve the issues. Mr. Mayo did not respond.

On September 17, 2015, Justin Chen and Amir Alavi called and left a message for Mr. Mayo requesting some kind of response or resolution on the production issues underlying the motion to compel. The only response received from STMicro was a voicemail message from STMicro’s outside counsel received late in the day on Thursday September 17, 2015. This Court

set the date for compliance with its September 11, 2015 motion at no later than 5:00 p.m. Monday, September 21, 2015. Given the fact that STMicro waited until late Friday afternoon to respond to Nexus's inquiries it was impossible for the parties to confer in advance of today's deadline.

Nexus remains willing to attempt to compromise with STMicro on the scope of these discovery issues but in order to do so the parties must actually meet and confer on these issues. Given the clerical error on Nexus's part and STMicro's unresponsiveness to Nexus's inquiries Nexus would request the Court's September 21, 2015, deadline be extended until September 25, 2015.

Finally, as STMicro notes, discovery in the underlying case ended on September 7, 2015, the day Nexus originally filed its Motion to Compel against STMicro. Nexus waited until the last day of discovery as it had hoped that it would be able to work these issues out with STMicro and avoid a motion to compel.

Dated: September 21, 2015

Respectfully submitted,

/s/ Amir Alavi

Amir Alavi

Texas State Bar No. 00793239

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**ATTORNEY-IN-CHARGE FOR NEXUS
DISPLAY TECHNOLOGIES LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this day, September 21, 2015, I electronically filed the above Movant Nexus Display Technologies LLC's Submission Pursuant to Order Dated September 11, 2015 with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

/s/ Amir Alavi

Amir Alavi